

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF SETH  
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert Daniel Catenacci, M.D.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Daniel Catenacci, M.D., dated August 27, 2021, with Exhibits A-D served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of Daniel Catenacci, M.D., in MDL 2875, dated September 13-14, 2021, with errata.

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' Disclosure of Cancer Types, dated December 31, 2020, served in MDL 2875.

5. Attached hereto as Exhibit D is a true and correct copy of "Use of N-nitrosodimethylamine (NDMA) contaminated valsartan products and risk of cancer: Danish nationwide cohort study," by Anton Pottegard, *et al*, dated September 12, 2018.

6. Attached hereto as Exhibit E is a true and correct copy of "N-Nitrosodimethylamine-Contaminated Valsartan and the Risk of Cancer," by Willy Gomm, *et al*, dated May 28, 2021.

7. Attached hereto as Exhibit F is a true and correct copy of "IARC Monographs on the Identification of Carcinogenic Hazards to Humans: Questions and Answers," by the International Agency for Research on Cancer, World Health Organization, dated December 10, 2019.

8. Attached hereto as Exhibit G is a true and correct copy of the Expert Report of Lewis A. Chodosh, M.D., Ph.D., dated September 24, 2021, with Exhibits A-C served in MDL 2875.

9. Attached hereto as Exhibit H is a true and correct copy of the Expert Report of George Johnson, Ph.D., dated October 1, 2021, with Exhibits A-C served in MDL 2875.

10. Attached hereto as Exhibit I is a true and correct copy of “Drinking Water as a Proportion of Total Human Exposure to Volatile *N*-Nitrosamines,” by Steve E. Hrudey, *et al*, dated June 20, 2013, Risk Analysis, Vol. 33, No. 12.

11. Attached hereto as Exhibit J is a true and correct copy of “Toward Personalized Treatment of Advanced Biliary Tract Cancers,” by Daniel M. Geynisman, *et al*, dated July 26, 2012.

12. Attached hereto as Exhibit K is a true and correct copy of “The Environment and Disease: Association or Causation?” by Sir Austin Bradford Hill, dated January 14, 1965.

13. Attached hereto as Exhibit L is a true and correct copy of the transcript of the deposition of Mahyar Etminan, Ph.D., in MDL 2875, dated August 24, 2021.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Liaison Counsel*  
*for Defendants*

DUANE MORRIS LLP

30 South 17th Street

Philadelphia, PA 19103-4196

Tel.: (215) 979-1000

Fax: (215) 979-1020

SAGoldberg@duanemorris.com

*Attorney for Zhejiang Huahai*  
*Pharmaceutical Co, Ltd., Princeton*  
*Pharmaceutical Inc., and Solco*  
*Healthcare US, LLC*

Dated: December 1, 2021.

DM1\12651057.1